

HONORABLE RICHARD A. JONES

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

UNITED STATES OF AMERICA,

Plaintiff,

v.

BERNARD ROSS HANSEN, and
DIANE RENEE ERDMANN,

Defendants.

Case No. CR18-0092-RAJ

**JOINT STIPULATION AND
[PROPOSED] ORDER EXTENDING
DEADLINE FOR MOTIONS *IN*
LIMINE AND REGARDING JURY
SELECTION**

NOTING DATE: October 29, 2020

IT IS HEREBY STIPULATED by and between all counsel that, subject to Court approval, the deadline for filing motions *in limine* and regarding jury selection shall be extended from November 6, 2020, to January 8, 2021, with responses (if any) due on January 22, 2021.

Additionally, because the government's production of discovery is ongoing, defendants specifically reserve the right in entering this stipulation to file additional motions if they arise from materials that are subsequently produced.

Pursuant to this Court's Order Continuing Trial and Setting Amended Case Schedule (Dkt. No. 192), the current deadline for filing pretrial motions, including motions *in limine* and regarding jury selection, is November 6, 2020. Subject to Court approval, the parties have

JOINT STIPULATION AND [PROPOSED]
ORDER EXTENDING DEADLINE FOR
MOTIONS *IN LIMINE* AND REGARDING
JURY SELECTION
(Case No. 18-cr-0092-RAJ) - 1

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1 stipulated to an extension of that deadline to January 8, 2021, as it relates to motions *in limine* and
 2 regarding jury selection. The parties anticipate that a motion to sever trials of the defendants will
 3 be filed in this matter, and the Court's ruling on severance will certainly affect the nature and
 4 scope of any motions *in limine* and jury selection motions. Extending the deadline for filing such
 5 motions until after the Court's anticipated ruling on the severance issue and other pretrial motions
 6 (the hearing for which is currently scheduled for December 11, 2020), will allow the parties to
 7 streamline motions *in limine* and on jury selection.

8 At this time, the parties do not foresee this extension causing delay to any other currently
 9 set deadlines. If the Court approves the parties' stipulation, the parties will file any motions *in*
 10 *limine* and regarding jury selection on or before January 8, 2021, with responses due on or before
 11 January 22, 2021.

12 For the above reasons, and subject to Court approval, the parties hereby agree and stipulate
 13 that the deadline for the parties to file motions *in limine* and regarding jury selection shall be
 14 extended to January 8, 2021, with responses (if any) due on or before January 22, 2021.

15 It is so stipulated.

16 Dated this 29th day of October, 2020.

17 Respectfully submitted,

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[PROPOSED] ORDER

THIS MATTER having come on before the above-entitled Court upon stipulation of counsel, and the Court having examined the records and being fully advised in the matter, now, therefore,

IT IS HEREBY ORDERED that the deadline for filing motions *in limine* and regarding jury selection shall be extended from November 6, 2020 to January 8, 2021, with responses (if any) due on or before January 22, 2021.

Based on the foregoing, IT IS SO ORDERED.

DATED this ____ day of _____, 2020

THE HONORABLE RICHARD A. JONES
UNITED STATES DISTRICT JUDGE